

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

FILED

2025 APR 17 PM 4:00

U.S. DISTRICT COURT  
MIDDLE DISTRICT OF TN

Dr. Regine Jordan-Sodiq  
Plaintiff(s),

Case Number 3:25-cv-00288

v.

Judge Judge Eli Richardson

State of TN, et al, and  
Defendant(s).  
Navy Federal Credit Union

Magistrate Judge \_\_\_\_\_

Response to Defendant Navy Federal  
(Type of Pleading)

Credit Union Motion

① Exhibit E USPS confirmation receipt  
to Registered Agent and Attorney

② Exhibit F Summons to Navy Federal  
cc-25-cv-170

③ Exhibit D #1 - #2 USPS Postal receipts  
to All Defendants listed on the receipts

④ Exhibit D My Navy Federal bank  
Statement showing my Name and membership

⑤ Exhibit C Navy Federal Brochure  
with "Mr. Joshua Graves" listed on  
my home address

⑥ Exhibit A Response to Navy Federal  
Credit Union motion to Dismiss dated  
3/14/25

This image shows a single page of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

1312  
  
(Signature)

REGINA JORDAN-SODIG  
(Print Name)

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
(Address & Telephone Number, if any)



PO Box 3000  
Merrifield, VA 22119-3000

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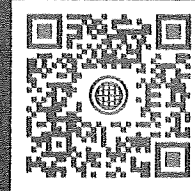
\*\*\*\*\*AUTO\*\*5-DIGIT 37042

A 560157 T2173 P1 59 241602000156725-252113EV01Y

Mr Joshua A Graves  
1757 Autumnwood Blvd  
Clarksville, TN 37042-1713



Join our credit union.  
Scan the QR code<sup>2</sup> to visit  
[navyfederal.org/PowerfulBenefits](http://navyfederal.org/PowerfulBenefits)



*Exhibit C*

Exhibit B

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

Dr. Regina Jordan-Sodiq, Plaintiff, v. State of Tennessee, et al., Defendants.

Case No. 3:25-CV-00288 Judge Eli Richardson Jury Demand

PLAINTIFF'S RESPONSE TO NAVY FEDERAL CREDIT UNION'S MOTION TO  
DISMISS

**Introduction** Plaintiff, Dr. Regina Jordan-Sodiq, respectfully submits this response opposing Defendant Navy Federal Credit Union's ("Navy") Motion to Dismiss. Plaintiff addresses each of Navy's contentions systematically to demonstrate the sufficiency of her claims, the appropriateness of the court's jurisdiction, and the adequacy of her service of process. Plaintiff further **objects to Navy's request for dismissal with prejudice**, which is unwarranted under both law and equity. Plaintiff respectfully requests this Honorable Court deny Defendant's motion.

**I. Service of Process**

Plaintiff asserts that service was properly executed in compliance with **Tenn. R. Civ. P. 4.03(2) and 4.04(4)**. Plaintiff served process to Navy Federal Credit Union's registered agent in <sup>268 Broadway</sup> Tennessee, ~~The Corporation Service Company~~, located at ~~2000 West 10th Street, Suite 1000,~~ <sup>Centre way</sup> ~~Knoxville, TN 37917~~. Evidence of service, including the signed return receipt and proof of <sup>Suite 203</sup> mailing, will be presented to the Court. Defendant's allegations regarding service lack merit and <sup>Knoxville TN</sup> do not justify dismissal under **Rule 12(b)(5)**. <sup>37919</sup>

Should this Honorable Court find any procedural deficiencies in service, Plaintiff respectfully requests leave to correct such deficiencies pursuant to **Fed. R. Civ. P. Rule 4(m)**, which permits time to cure errors in service.

**II. Specificity in Claims**

Contrary to Navy's assertions, Plaintiff's Complaint provides sufficient factual allegations to state a claim against Navy. The Complaint specifically identifies Navy's role in acts of harassment and covert gang stalking that caused harm to Plaintiff. Plaintiff provides factual specificity, distinguishing Navy's actions from other defendants.

Plaintiff's allegations comply with **Tenn. R. Civ. P. 8.01**, requiring a "short and plain statement of the claim showing that the pleader is entitled to relief." Furthermore, Tennessee courts recognize the need for leniency in construing pro se pleadings to ensure access to justice (**Steele v. Bradley**, 684 S.W.2d 375, Tenn. App. 1984).

**III. Legal Basis for Claims**

Defendant argues that **Tenn. Code Ann. §39-17-308 and §39-17-315** do not provide private rights of action. Plaintiff counters that while these statutes are criminal in nature, the conduct described—harassment and stalking—provides grounds for related civil claims under tort law, such as intentional infliction of emotional distress (IIED) and invasion of privacy. Plaintiff reserves the right to pursue additional claims addressing the harmful and unlawful actions of Navy.

Moreover, Plaintiff notes that Navy's conduct falls under actionable civil claims, and further discovery will substantiate these allegations.

#### **IV. Conspiracy Allegations**

Defendant contends that Plaintiff's conspiracy allegations lack particularity. Plaintiff clarifies that under Tennessee law, a conspiracy claim requires:

1. **Common Design:** An agreement among defendants to engage in harassment and intimidation.
2. **Concerted Actions:** Coordinated activities by Navy and others to achieve unlawful objectives.
3. **Overt Acts:** Specific actions taken in furtherance of the conspiracy, including harassment directed at Plaintiff.
4. **Resulting Injury:** Tangible and emotional harm suffered by Plaintiff as a result of the conspiracy.

Plaintiff's Complaint satisfies these elements. Moreover, pro se litigants are entitled to leniency in pleadings, and Plaintiff seeks discovery to further substantiate these claims.

#### **V. Response to Request for Dismissal With Prejudice**

Defendant's request for dismissal **with prejudice is unjustified**. Dismissal with prejudice is a severe remedy reserved for cases where amendment or correction would be futile. Plaintiff contends her claims are legally and factually viable, and any deficiencies—if found—can be addressed through amendment or clarification.

Plaintiff respectfully requests this Honorable Court deny Defendant's request for dismissal with prejudice and allow Plaintiff to proceed to discovery or grant leave to amend if necessary. **Dismissal without prejudice** would be the appropriate remedy if any corrections are required.

#### **VI. Requested Relief**

Plaintiff's requested relief is directly tied to the damages incurred as a result of Defendant's conduct, including:

- Compensatory damages for financial loss resulting from unauthorized transactions.
- Emotional distress and harm caused by harassment and covert gang stalking.
- Other tangible losses related to Defendant's actions.

Plaintiff respectfully requests this Honorable Court uphold her right to seek appropriate relief for the harm suffered.

**Conclusion** For the foregoing reasons, Plaintiff respectfully requests that this Honorable Court deny Navy Federal Credit Union's Motion to Dismiss, including Defendant's request for dismissal with prejudice, and allow this case to proceed.

**Certificate of Service** I certify that on this 3<sup>rd</sup> day of April 2025, a true and correct copy of the foregoing Response to Navy Federal Credit Union's Motion to Dismiss was served via [U.S. Mail/Electronic Service] confirmation receipt to the following parties:

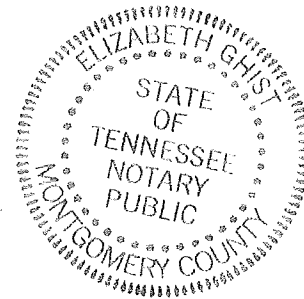
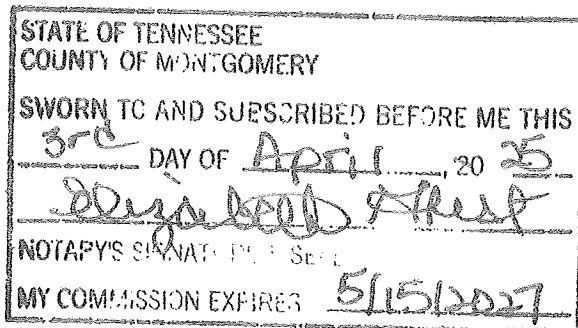
Katherine R. Rogers Burr & Forman, LLP 222 2nd Avenue South, Suite 2000 Nashville, TN 37201 krogers@burr.com

**Affidavit of Service** I, Dr. Regina Jordan-Sodiq, do hereby affirm that the Complaint and Summons were properly served on Navy Federal Credit Union via their registered agent, ~~The Corporation Service Company, located at 2000 West 10th Street, Suite 1000, Knoxville, TN 37917.~~ Supporting documents, including the signed return receipt and proof of mailing, are attached hereto as exhibit A. ADDRESS: 265 Brookview Cndrmenty, Suite 203 Knoxville TN 37919

Signed: Dr. Regina Jordan-Sodiq Dr. Regina Jordan-Sodiq, Pro se Date:

Respectfully submitted,

Dr. Regina Jordan-Sodiq, Pro se Plaintiff  
1757 Autumnwood Blvd., Clarksville, TN 37042





ARMY  
MARINE CORPS  
NAVY  
AIR FORCE  
SPACE FORCE  
COAST GUARD  
VETERANS

Routing Number: 256074974

Sign Out



MRS REGINA D JORDAN-SODIQ  
Member since 1992



Accounts Move Money Cards Statements My MakingCents More ^

+ Open New Account

## Accounts

EDIT ACCOUNTS VIEW PRINT

TOTAL

\$18,501.77



It's Tax Season!

View tax information

## Checking

\$686.78



EveryDay Checking - 1695

\$686.78

Available Balance

## Quick Links

Start Transfer



Bill Pay

## Savings

\$17,814.99



Membership Share Savings - 4909

\$12.17

Available Balance



Membership Share Savings - 4917

Primary Owner: TIMOTHY J JORDAN

\$14,718.16

Available Balance



Money Market Savings - 4933

\$3,084.66

Available Balance



Zelle®



9:36 PM  
4/10/2025

Exhibit D



ALAFAYA  
650 N ALAFAYA TRL STE 101  
OLD ARMO, FL 32828-9997  
(800)275-8777

02/06/2025

11:21 AM

Product	Qty	Unit Price	Price
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Priority Mail®	1		\$10.10
Flat Rate Env			
Clarksville, TN 37040			
Flat Rate			
Expected Delivery Date			
Fri 02/07/2025			
Tracking #:			
9510 8132 4936 5036 9219 48			
Insurance		\$0.00	
Up to \$100.00 included			
Signature		\$4.55	
Confirm			
Total			\$14.65

Priority Mail®	1		\$10.10
Flat Rate Env			
Hermitage, TN 37076			
Flat Rate			
Expected Delivery Date			
Fri 02/07/2025			
Tracking #:			
9510 8132 4938 5036 9219 62			
Insurance		\$0.00	
Up to \$100.00 included			
Signature		\$4.55	
Confirm			
Total			\$14.65

Priority Mail®	1		\$10.10
Flat Rate Env			
Hyattsville, MD 20783			
Flat Rate			
Expected Delivery Date			
Fri 02/07/2025			
Tracking #:			
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Insurance		\$0.00	
Up to \$100.00 included			
Signature		\$4.55	
Confirm			
Total			\$14.65

Priority Mail®	1		\$10.10
Flat Rate Env			
Clarksville, TN 37044			
Flat Rate			
Expected Delivery Date			
Fri 02/07/2025			
Tracking #:			
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Insurance		\$0.00	
Up to \$100.00 included			
Signature		\$4.55	
Confirm			
Total			\$14.65

Priority Mail®	1		\$10.10
Flat Rate Env			
Clarksville, TN 37040			
Flat Rate			
Expected Delivery Date			
Fri 02/07/2025			
Tracking #:			
9510 8132 4938 5036 9220 20			

Exhibit A D



ALAFAYA  
650 N ALAFAYA TRL STE 101  
OLD ARMO, FL 32828-9997  
(800)275-8777

02/06/2025

12:33 PM

Product	Qty	Unit Price	Price
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Priority Mail®	1		\$10.10
Flat Rate Env			
Hyattsville, MD 20783			
Flat Rate			
Expected Delivery Date			
Sat 02/08/2025			
Tracking #:			
9510 8132 4936 5037 0612 70			
Insurance		\$0.00	
Up to \$100.00 included			
Signature		\$4.55	
Confirm			
Total			\$14.65

Priority Mail®	1		\$10.10
Flat Rate Env			
Clarksville, TN 37042			
Flat Rate			
Expected Delivery Date			
Sat 02/08/2025			
Tracking #:			
9510 8132 4936 5037 0612 94			
Insurance		\$0.00	
Up to \$100.00 included			
Signature		\$4.55	
Confirm			
Total			65

Priority Mail®	1		\$10.10
Flat Rate Env			
Clarksville, TN 37040			
Flat Rate			
Expected Delivery Date			
Sat 02/08/2025			
Tracking #:			
9510 8132 4936 5037 0613 17			
Insurance		\$0.00	
Up to \$100.00 included			
Signature		\$4.55	
Confirm			
Total			\$14.65

Priority Mail®	1		\$10.10
Flat Rate Env			
Clarksville, TN 37040			
Flat Rate			
Expected Delivery Date			
Sat 02/08/2025			
Tracking #:			
9510 8132 4936 5037 0613 31			
Insurance		\$0.00	
Up to \$100.00 included			
Signature		\$4.55	
Confirm			
Total			\$14.65

Priority Mail®	1		\$10.10
Flat Rate Env			
Clarksville, TN 37040			
Flat Rate			
Expected Delivery Date			

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Tracking #: 9510 8132 4936 5036 9222 64  
Insurance Up to \$100.00 included \$0.00  
Signature Confirm \$4.55  
Total \$14.65

Priority Mail® 1 \$10.10  
Flat Rate Env  
Westlake Village, CA 91361  
Flat Rate  
Expected Delivery Date Sat 02/08/2025  
Tracking #: 9510 8132 4936 5036 9222 47  
Insurance Up to \$100.00 included \$0.00  
Signature Confirm \$4.55  
Total \$14.65

Priority Mail® 1 \$10.10  
Flat Rate Env  
Clarksville, TN 37040  
Flat Rate  
Expected Delivery Date Fri 02/07/2025  
Tracking #: 9510 8132 4936 5036 9222 66  
Insurance Up to \$100.00 included \$0.00  
Signature Confirm \$4.55  
Total \$14.65

Priority Mail® 1 \$10.10  
Flat Rate Env  
Chickasha, OK 73012  
Flat Rate  
Expected Delivery Date Fri 02/07/2025  
Tracking #: 9510 8132 4936 5036 9222 60  
Insurance Up to \$100.00 included \$0.00  
Signature Confirm \$4.55  
Total \$14.65

Grand Total: \$219.75

Debit Card Remit \$219.75  
Card Name: VISA  
Account #: XXXXXXXXXX1576  
Approval #: 412462  
Transaction #: 944  
Receipt #: 100464  
Debit Card Purchase: \$219.75  
AID: A000000980840 Chip  
AL: US DEBIT  
PIN: Verified

In a hurry? Self-service kiosks offer quick and easy check-out. Any Retail Associate can show you how.

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit [www.usps.com/USPS-tracking](http://www.usps.com/USPS-tracking) or call 1-800-222-1811.

Save this receipt as evidence of insurance. For information on filing an insurance claim go to <https://www.usps.com/help/claims.htm> or call 1-800-222-1811

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Insurance Up to \$100.00 included \$0.00  
Signature Confirm \$4.55  
Total \$14.65

Priority Mail® 1 \$10.10  
Flat Rate Env  
Seattle, WA 98109  
Flat Rate  
Expected Delivery Date Sat 02/08/2025

Tracking #: 9510 8132 4936 5037 0614 78  
Insurance Up to \$100.00 included \$0.00  
Signature Confirm \$4.55  
Total \$14.65

Priority Mail® 1 \$10.10  
Flat Rate Env  
Clarksville, TN 37040  
Flat Rate  
Expected Delivery Date Sat 02/08/2025

Tracking #: 9510 8132 4936 5037 0614 92  
Insurance Up to \$100.00 included \$0.00  
Signature Confirm \$4.55  
Total \$14.65

Grand Total: \$161.15

Debit Card Remit \$161.15  
Card Name: VISA  
Account #: XXXXXXXXXX1576  
Approval #: 562181  
Transaction #: 175  
Receipt #: 103683  
Debit Card Purchase: \$161.15  
AID: A000000980840 Chip  
AL: US DEBIT  
PIN: Verified

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Insurance  
Up to \$100.00 included \$4.55  
Signature  
Confirm \$14.65  
Total \$19.10  
Priority Mail® 1  
Flat Rate Env  
Cincinnati, OH 45202  
Flat Rate  
Expected Delivery Date  
Fri 02/01/2025  
Tracking #: 9510 1102 4520 5000 5222 60 \$0.00  
Insurance  
Up to \$100.00 included \$4.55  
Signature  
Confirm \$14.65  
Total

Grand Total: \$219.75

Debit Card Receipt  
Card Name: VISA  
Account #: XXXXXXXXX001576  
Approval #: 412462  
Transaction #: 944  
Receipt #: 100464  
Debit Card Purchase: \$219.75  
AID: A000000000000000  
AL: US DEBIT  
PIN: Verified

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Save this receipt as evidence of insurance. For information on filing an insurance claim go to <https://www.usps.com/help/claims.htm> or call 1-800-222-1811

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or call 1-800-410-7420.

URN: 110944 0875  
Receipt #: 640 53270361-5-11/536-45-2  
Clerk: 07

<b>Circuit Court</b> <b>Montgomery County</b> <b>Clarksville Tennessee</b>	<h1 style="margin: 0;">CIVIL SUMMONS</h1>	<b>Case Number</b> <u>CC-25-CV-170</u>
<u>DR. Robert Jordan-Schuy VS. Navy Federal Credit Union et al</u>		

Serve On: Name Navy Federal Credit Union Address 2605 Wilma Rudolph Blvd Clarksville  
 Serve By: Montgomery Co Sheriff's Dept Secretary of State Comm of Insurance Other (Specify) IN 37046

You are hereby summoned to defend a civil action filed against you in Circuit Court, Montgomery County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: 11/31/25  
[Signature]  
 Wendy Davis, Clerk / Deputy Clerk

Attorney for Plaintiff: \_\_\_\_\_

## NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state case number on list.

## CERTIFICATION (IF APPLICABLE)

I, Wendy Davis, Circuit Court Clerk of Montgomery County, Tennessee, do certify this to be a true and correct copy of the original summons issued in this case.

Date: \_\_\_\_\_  
 Wendy Davis, Clerk / Deputy Clerk

**SERVICE RETURN:** Please execute this summons and make your return within ninety days of issuance as provided by law.

I certify that I have served this summons and complaint as follows: \_\_\_\_\_

I certify that I was unable to serve the summons and complaint because: \_\_\_\_\_

Date: \_\_\_\_\_ By: \_\_\_\_\_  
 Officer, Title/Process Server

**RETURN ON SERVICE OF SUMMONS BY MAIL:** I hereby certify and return that on 2/5-2/6-2025 I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant Navy Federal Credit Union On 3-11-25 I received the return receipt, which had been signed by as per Motion for Dismiss. The return receipt is attached to this original summons to be filed by the Court Clerk.

[Signature]  
 Plaintiff's Attorney (or Person Authorized to Serve Process)

SWORN TO AND SUBSCRIBED BEFORE ME  
 THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 20\_\_\_\_

Notary Public / Deputy Clerk (Comm. Expires \_\_\_\_\_)

(Attach return receipt on back)

Exhibit E

**Instructions**

1. Please use a laser or laser-quality printer.
2. Adhere shipping label to package with tape or glue - DO NOT TAPE OVER BARCODE. Be sure all edges are secure. Self-adhesive label is recommended.
3. Place label so that it does not wrap around the edge of the package.
4. Each shipping label number is unique and can be used only once - DO NOT PHOTOCOPY.
5. Please use this shipping label on the "ship date" selected when you requested the label.
6. If a mailing receipt is required, present the article and Online e-Label Record at a Post Office for postmark.

9410 8301 0935 5003 3651 51

Print Date: 2025-04-02	PRIORITY MAIL®	\$8.75
Ship Date: 2025-04-02	Extra Services:	\$3.70
	Fees:	<u>\$0.00</u>
	Total:	\$12.45

**From:** REGINA JORDAN-SODIQ  
1757 AUTUMNWOOD BLVD  
CLARKSVILLE TN 37042-1713

**To:** BURR & FORMAN, LLP  
KATHERINE R ROGERS  
STE 2000  
222 2ND AVE S  
NASHVILLE TN 37201-2385

\* Commercial Pricing PRIORITY MAIL® rates apply. There is no fee for USPS Tracking® service on PRIORITY MAIL® service with use of this electronic rate shipping label. Refunds for unused postage paid labels can be requested online 30 days from the print date.

**UNITED STATES  
POSTAL SERVICE®**

*Thank you for shipping with the United States Postal Service!  
Check the status of your shipment on the USPS Tracking® page at [usps.com](https://usps.com)*

Cut on dotted line.

**Instructions**

1. Please use a laser or laser-quality printer.
2. Adhere shipping label to package with tape or glue - DO NOT TAPE OVER BARCODE. Be sure all edges are secure. Self-adhesive label is recommended.
3. Place label so that it does not wrap around the edge of the package.
4. Each shipping label number is unique and can be used only once - DO NOT PHOTOCOPY.
5. Please use this shipping label on the "ship date" selected when you requested the label.
6. If a mailing receipt is required, present the article and Online e-Label Record at a Post Office for postmark.

9410 8301 0935 5003 0010 04

Print Date: 2025-03-13	PRIORITY MAIL®	\$8.75
Ship Date: 2025-03-13	Extra Services:	\$3.70
	Fees:	<u>\$0.00</u>
	Total:	\$12.45

**From:** REGINA JORDAN-SODIQ  
1757 AUTUMNWOOD BLVD  
CLARKSVILLE TN 37042-1713

**To:** C/O KATHERINE R. ROGERS BURR & FORMAN LL  
ANGELA BEASELY  
STE 2000  
222 2ND AVE S  
NASHVILLE TN 37201-2385

\* Commercial Pricing PRIORITY MAIL® rates apply. There is no fee for USPS Tracking® service on PRIORITY MAIL® service with use of this electronic rate shipping label. Refunds for unused postage paid labels can be requested online 30 days from the print date.

**UNITED STATES  
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Exhibit A

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, TENNESSEE

DR. REGINA JORDAN-SODIQ, Plaintiff, v. STATE OF TENNESSEE, et al., Defendants.  
Case No.: CC-25-CV-170

PLAINTIFF'S RESPONSE TO DEFENDANT NAVY FEDERAL CREDIT UNION'S  
MOTION TO DISMISS

**Introduction**

Dr. Regina Jordan-Sodiq ("*Plaintiff*") respectfully submits this response opposing Defendant Navy Federal Credit Union's ("*Navy*") Motion to Dismiss. Plaintiff asserts that Defendant's motion lacks merit and fails to meet the standards required for dismissal under the Tennessee Rules of Civil Procedure. Plaintiff's Complaint provides sufficient legal and factual grounds to proceed. Therefore, Plaintiff respectfully requests this Honorable Court deny Defendant's motion.

**Factual Background**

From 2023 to the present, Plaintiff has experienced a series of harmful and distressing actions connected to Defendant Navy Federal Credit Union and its employees, including:

1. **Unauthorized Transactions:** Plaintiff discovered repeated unauthorized withdrawals from her account. Despite promptly notifying Navy, Defendant failed to prevent further unauthorized charges, resulting in significant financial losses and forcing Plaintiff to close her credit card to safeguard her finances.
2. **Harassment at the Bank:** During an in-person visit to address unauthorized transactions, Navy employees behaved inappropriately. One employee discussed "pulling weeds" with another customer, an apparent mocking reference made in Plaintiff's presence after Plaintiff requested a manager. This created a hostile and uncomfortable environment.
3. **Community Harassment and Retaliatory Actions:** On March 11, 2025, Plaintiff observed teenagers distributing brochures in her neighborhood. One such brochure, handed to Plaintiff's son, contained imagery resembling a personal self-help book Plaintiff was developing. The brochure included the caption "weed man for the win," which Plaintiff believes was a deliberate attempt to mock her. Notably, the timing coincided with Defendant filing their Motion to Dismiss, suggesting a coordinated effort to intimidate Plaintiff.
4. **Condescending and Dismissive Conduct:** Plaintiff experienced dismissive remarks from Navy employees while addressing her concerns, further exacerbating emotional distress and reinforcing a hostile pattern of behavior.

These incidents have caused significant emotional distress, financial harm, and reputational damage to Plaintiff. Plaintiff contends that these actions are part of a broader pattern of harassment designed to intimidate and discredit her.

## **I. Plaintiff's Complaint Satisfies Rule 8.01 Requirements**

Plaintiff's Complaint complies with Tennessee Rule of Civil Procedure 8.01, requiring a "*short and plain statement of the claim showing that the pleader is entitled to relief.*"

- The Complaint specifically identifies Defendant Navy as responsible for Plaintiff's harm.
- Tennessee courts recognize the need for leniency in construing pro se litigants' pleadings to ensure access to justice (*Steele v. Bradley*, 684 S.W.2d 375, Tenn. App. 1984).
- Plaintiff's allegations provide sufficient notice, with further details to emerge during discovery.

## **II. Plaintiff's Allegations Address Statutory Violations**

Defendant mistakenly argues that Plaintiff's reliance on criminal statutes (e.g., T.C.A. §39-17-308 *harassment* and §39-17-315 *stalking*) is improper. While these statutes are criminal in nature:

1. Plaintiff describes behavior consistent with statutory violations, evidencing intentional and harmful conduct.
2. Plaintiff reserves the right to pursue related civil or federal claims addressing these wrongful actions.

Tennessee courts permit broad discretion in interpreting pro se litigants, warranting discovery to substantiate Plaintiff's allegations. Plaintiff respectfully requests the opportunity to amend the Complaint if necessary to ensure justice is served.

## **III. Plaintiff's Conspiracy Allegations are Well-Pleaded**

Defendant claims Plaintiff's conspiracy allegations lack particularity. However, under Tennessee law, a conspiracy claim requires:

1. A common design between parties.
2. Concerted actions to achieve an unlawful goal or lawful goal through unlawful means.
3. An overt act in furtherance of the conspiracy.
4. Resulting injury to Plaintiff (*Kincaid v. SouthTrust Bank*, 221 S.W.3d 32, Tenn. Ct. App. 2006).

Plaintiff asserts coordinated efforts by Defendant and others to harass and deny Plaintiff due process. The allegations meet pleading standards and warrant further examination in discovery.

## **IV. Plaintiff's Requested Relief is Justified**

Plaintiff's requested relief directly corresponds to the harm caused, including:

- Financial damage resulting from unauthorized transactions.
- Emotional distress and harm caused by harassment.

- Reputational, professional, and personal setbacks resulting from Defendant's actions.

Tennessee law empowers courts to tailor damages to address harm experienced by Plaintiffs.

#### **V. Leniency for Pro Se Litigants and Request for Amendment**

As a pro se litigant, Plaintiff respectfully invokes the principle of leniency afforded to self-represented individuals in Tennessee courts. Plaintiff also requests leave to amend the Complaint under **Tennessee Rule of Civil Procedure 15.01**, should the Court identify any deficiencies, to ensure justice is served.

#### **Conclusion**

For these reasons, Plaintiff respectfully requests that this Honorable Court deny Defendant Navy Federal Credit Union's Motion to Dismiss, allowing the case to proceed to discovery.

Respectfully submitted,

  
Dr. Regina Jordan-Sodiq

1757 Autumnwood Blvd. Clarksville, TN 37042

Pro Se Plaintiff


**CERTIFICATE OF SERVICE**

I, Dr. Regina Jordan-Sodiq, hereby certify that on this 13th day of March, 2025, a true and correct copy of the foregoing **Plaintiff's Response to Defendant Navy Federal Credit Union's Motion to Dismiss** was served via e-mail and/or U.S. Mail, first-class postage pre-paid, upon:

Katherine R. Rogers Burr & Forman LLP 222 2nd Avenue South, Suite 2000 Nashville, TN 37201 krogers@burr.com

Angela Beasley Legal Practice Assistant Burr & Forman LLP 222 2nd Avenue South, Suite 2000 Nashville, TN 37201 abeasley@burr.com

**Signature:**

A handwritten signature in black ink, appearing to read 'Dr. Regina Jordan-Sodiq', is written over the printed name. The signature is stylized and cursive.

**Dr. Regina Jordan-Sodiq, Pro Se Plaintiff**

March 13, 2025

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee at N

Dr. Regina Jordan-Sodiq,

Plaintiff(s)

v.

State of Tennessee, et.al., and Navy Federal Credit  
Union

Defendant(s)

Civil Action No. 3:25-cv-00288 Judge Eli Richardson

SUMMONS IN A CIVIL ACTION

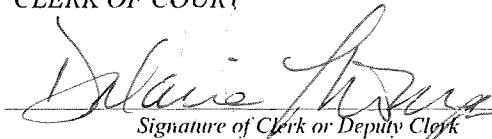
To: (Defendant's name and address) The Corporation Service Company (Registered Agent)  
Navy Federal Credit Union  
265 Brookview Centre Way  
Suite 203  
Knoxville, TN 37919

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

  
Signature of Clerk or Deputy Clerk

Date: APR 14 2025

RETURN COPY

Civil Action No. 3:25-cv-00288 Judge Eli Richardson

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

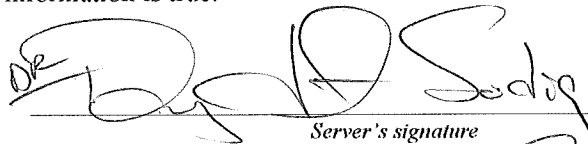
☒ Other *(specify)*: I mailed USPS Confirmation receipt and  
email. To the Attorney and Registered Agent

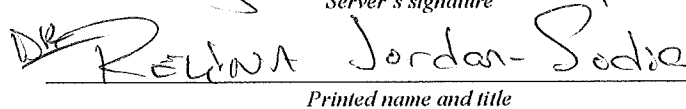
My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date:

4/17/25

  
\_\_\_\_\_  
Server's signature

  
\_\_\_\_\_  
Printed name and title

\_\_\_\_\_  
Server's address

Additional information regarding attempted service, etc: